

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**RICHARD BANKHEAD,**

**PLAINTIFF,**

**AMERICAN SUZUKI MOTOR CORP., et al.,**

**DEFENDANT.**

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**CASE NO.: 03: 07 CV208-MHT**

**PLAINTIFF'S RESPONSE TO DEFENDANT'S REQUEST FOR PRODUCTION**

**COMES NOW, Plaintiff, by and through counsel of record and responds to  
Defendant's Request for Production as follows:**

- (1) see attached
- (2) see attached
- (3) see attached
- (4) see attached
- (5) see attached
- (6) see attached
- (7) none
- (8) none known
- (9) see attached
- (10) see attached
- (11) see attached
- (12) see attached

- (13) Plaintiff does not understand this request. However, Defendant has been allowed to view and examine the motorcycle.
- (14) see attached
- (15) previously produced; otherwise none
- (16) see # 15
- (17) Previously produced; otherwise none
- (18) see attached
- (19) see attached
- (20) Plaintiff intends to offer all requested documents and/or material at trial.
- (21) see attached
- (22) see attached; otherwise none
- (23) see attached; otherwise none
- (24) see attached; otherwise none
- (25) none known
- (26) none known
- (27) see attached
- (28) see attached
- (29) see attached
- (30) see attached
- (31) see attached; otherwise none
- (32) none
- (33) see attached

Respectfully submitted this the 17<sup>th</sup> day of January, 2008.

Of Counsel:

/s/ Stewart S. Wilbanks  
Dillard & Associates, LLC  
2015 2<sup>nd</sup> Avenue North  
4<sup>th</sup> Floor  
Birmingham, AL 35203  
(205) 251-2823 (Telephone)  
(205) 251-3832 (Facsimile)  
[ssw-da@hotmail.com](mailto:ssw-da@hotmail.com)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2008, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: John Dickson Mayo, Esq. Lightfoot, Franklin & White, L.L.C, 400 20<sup>th</sup> Street N., Birmingham, AL 35203, Zachary T. Collins, Esq., 207 Montgomery Street, Ste. 213, Montgomery, AL 36104; and hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: NONE.

Respectfully Submitted,

/s Stewart S. Wilbanks  
Stewart S. Wilbanks  
DILLARD AND ASSOCIATES, L.L.C  
Fourth Floor, Berry Building  
2015 Second Avenue North  
Birmingham, Alabama 35203  
Telephone: (205) 251-2823  
Fax: (205) 251-3832  
Email: [dillardandassoc@aol.com](mailto:dillardandassoc@aol.com)  
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